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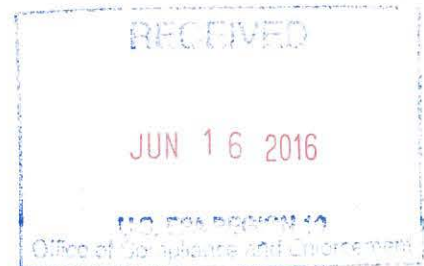
City of Parma



P.O. Box 608
305 N. 3rd Street
Parma, Idaho 83660

phone: (208) 722-5138
fax: (208) 722-5139
email: info@parmacityhall.net

June 13, 2016



Director, Office of Water
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue, OW-133
Seattle, Washington 98101
Attn: PCS Data Entry Team

Re: City of Parma, Idaho NPDES Permit Response to 5/10/16 Violation

To Whom It May Concern:

The City of Parma owns and operates a wastewater treatment facility under NPDES Permit No. ID-002177-6. The wastewater treatment facility consists of three lagoons, four rapid infiltration (RI) beds with under drain collection piping, and chlorination system prior to discharging. The treatment facility discharges into Sand Hollow Creek which is a tributary of the Snake River.

The City called the NPDES Compliance Hotline on 5/19/16 to report a violation on E. Coli May 10th, 13th, and 18th. The City also sent a letter to the EPA and Idaho Department of Environment Quality (DEQ) for written notification.

The purpose of this letter is to notify the EPA and DEQ that the City has taken corrective action to improve the disinfection system. The chlorination system was constructed in 1998 and includes dual gas chlorine injection systems, a mixing and chlorine contact chamber consisting of nearly 800 feet of 48-inch diameter plastic piping, manholes, and valves to control detention time. First, the City inspected the chlorine injection system and found no problems. Second, the City hired an outside contractor to hydro-clean the contact chamber while a vacuum truck removed the contents on the downstream side. The contents removed from the contact chamber consisted of a dark sludge that was discharged back into the first cell of the lagoon system. In performing this work it was discovered that groundwater is also infiltrating into the contact chamber and the City is investigating how to make repairs.

Since cleaning the contact chamber two samples have been taken to the laboratory for E. Coli testing with the results showing <1 MPN/100mL and the chlorine system is working as it should.

If you have any questions regarding the enclosed, please give me a call at (208) 722-5138. Thank you.

Sincerely,

Nathan Leigh
Mayor, City of Parma

C C

Cc.: Todd Crutcher, Idaho Department of Environmental Quality

C-6
ID 0021776
City of Parma

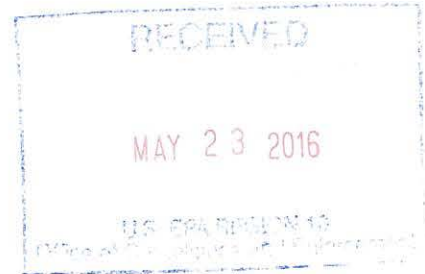


P.O. Box 608
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May 20, 2016

Director, Office of Water
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue, OW-133
Seattle, Washington 98101
Attn: PCS Data Entry Team



Re: City of Parma, Idaho NPDES Permit Violation

To Whom It May Concern:

The City of Parma owns and operates a wastewater treatment facility under NPDES Permit No. ID-002177-6. The wastewater treatment facility consists of three lagoons, four rapid infiltration (RI) beds with under drain collection piping, and chlorination system prior to discharging. The treatment facility discharges into Sand Hollow Creek which is a tributary of the Snake River. The City received results back from its testing laboratory that show permit violation for instantaneous maximum limit for E. Coli bacteria. On 5/19/16 the NPDES Compliance Hotline was called within 24 hours as required. This letter shall serve as written notification under the guideline of the permits noncompliance reporting requirement.

The E. Coli sample was taken on 5/10/16 and was recorded to be >2,400 MPN/100mL which exceeds Parma's NPDES permit limit of 406 MPN/100 mL.

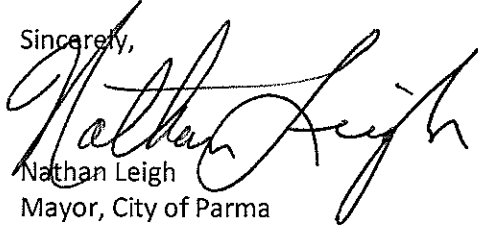
Date	Tested E. Coli Bacteria MPN/100ml	Permit Maximum 406/100ml
5/2/16	53	compliant
5/4/16	2	compliant
5/10/16	>2400	violation
5/13/16	>2400	violation
5/18/16	>2400	violation

The City is currently working to solve the issue of non-compliance. The City has experienced similar violations in the past which have either been corrected through natural occurrence or corrected through operational controls. The City is working diligently to correct the current violation by cleaning chlorination contact chamber and checking operational chorine injection system. In addition, the City is working with their consulting engineer for root causes of the violation. At this point it is believed that the chlorine is being tied up with

competing constituents of ammonia, organics, and/or hydrogen sulfide gas. The City will notify the EPA and DEQ of its findings and corrections taken to solving this important issue.

If you have any questions regarding the enclosed, please give me a call at (208) 722-5138. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathan Leigh". The signature is fluid and cursive, with the first name "Nathan" and last name "Leigh" clearly distinguishable.

Nathan Leigh
Mayor, City of Parma

Cc.: Todd Crutcher, Idaho Department of Environmental Quality

NPDES 24hr Non-Compliance Report - Call Summary

Call Received By

Jason Rodriguez

Date of Call

5/19/2016

Time of Call

12:30 PM

NonComp Date

5/19/2016

Sector

Muni

[Print Current Form](#)

[Mail Today's Report](#)

[Open Query](#)

Caller Name

Ken Steinhouse

Caller Phone #

208-873-4677

Facility Name

Parma, City of

Permit ID

ID0021776

NonCompliance Type

Effluent Limit Violation

Violation Description

E.coli exceedance

Comments

Form ID

1238

Entry Qtr

2016 Q2

Entry Date

5/20/2016

C-6

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April 22, 2016

Director, Office of Water
United States Environmental Protection Agency
Region 10
1200 Sixth Avenue, OW-133
Seattle, Washington 98101
Attn: PCS Data Entry Team



Re: City of Parma, Idaho NPDES Permit Violation

To Whom It May Concern:

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The E. Coli sample was taken on 4/8/16 and was recorded to be 770 MPN/100mL which exceeds Parma's NPDES permit limit of 406 MPN/100 mL. Looking at the E. Coli samples from before and after the violation show E. Coli was well within limits before and after.

Date	Tested E. Coli Bacteria MPN/100ml	Permit Maximum 406/100ml
4/1/16	6	compliant
4/8/16	770	violation
4/11/16	<1	compliant
4/13/16	68	compliant

The City wastewater operators had recently cleaned the underdrain of the RI Beds and in doing so the chlorine diffuser on the disinfection system was clogged with sand. City personnel removed the diffuser for repair and while removed the violation had occurred during discharge. Since then the diffuser has been reinstalled and an additional E. Coli sample for laboratory analysis was submitted.

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Sincerely,
Nathan Leigh
Mayor, City of Parma

Cc.: Todd Crutcher, Idaho Department of Environmental Quality

NPDES 24hr Non-Compliance Report - Call Summary

Call Received By

Jason Rodriguez

Date of Call

4/22/2016

Time of Call

10:30 AM

NonComp Date

4/22/2016

Sector

Muni

[Print Current Form](#)

[Mail Today's Report](#)

[Open Query](#)

Caller Name

Ken Steinhouse

Caller Phone #

208-573-4677

Facility Name

Parma, City of

Permit ID

ID0021776

NonCompliance Type

Effluent Limit Violation

Violation Description

E.coli exceedance

Comments

Form ID

1205

Entry Qtr

2016 Q2

Entry Date

4/22/2016